

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA

CASE NO. 3:14-cv-309 (FDW)

Demetris Antonio Jefferies, Sr.

Plaintiff,

vs.

FILED
CHARLOTTE, NC
JUN 13 2014
US District Court
Western District of NC
COMPLAINT

Metro Medal & Design Inc (MMDI)

200 Beltway Blvd.

Matthews, NC 28104

Defendant(s).

A. JURISDICTION

This action is brought pursuant to Title VII of the Civil Rights Act of 1964 as amended, for employment discrimination. Jurisdiction is specifically conferred on this Court by 42 U.S.C. Section 2000e(5). Equitable and other relief are also sought under 42 U.S.C. 2000e(5)(g). Jurisdiction is also based on 28 U.S.C. Sections 1331, 1343 and 42 U.S.C. Sections 1981 et seq. Where employment discrimination based upon age is alleged, jurisdiction is conferred by 28 U.S.C. Sections 626(c)(1) and 626(e) and appropriate relief is also sought.

B. PARTIES

1. Name of Plaintiff: Demeturiis Antonio Jefferies, Sr.
Address: 1912 Duke Adam St.
Kannapolis, NC 28083
2. Name of first Defendant: Metro Medallé Design Inc (MMDI)
Address: 200 Beltway Blvd.
Matthews, NC 28104
3. Name of second Defendant: _____
Address: _____
4. Name of third Defendant: _____
Address: _____

(Use additional sheets if necessary.)

C. NATURE OF CASE

1. The address at which I sought employment or was employed by the defendant(s) is:
200 Beltway Blvd.
Matthews, NC 28104
2. The discriminatory acts occurred on or about:
February 10, 2014 (Month, Day, Year)

3. I filed charges with the Equal Employment Opportunity Commission regarding the defendant's discriminatory conduct on or about:

February 21, 2014 (Month, Day, Year)

4. The Equal Employment Opportunity Commission sent the attached "Notice of Right to Sue" which I received on:

May 22, 2014 (Month, Day, Year)

5. The discriminatory acts that are the basis of this suit are:

- a. ☐ Failure to employ me.
- b. ☐ Failure to promote me.
- c. ☒ Termination of my employment.
- d. ☐ Demotion.
- e. ☒ Denied equal pay/work.
- f. ☐ Sexual harassment.
- g. ☐ General harassment.
- h. ☐ Other acts (Be specific: Attach an additional sheet if necessary)

6. Defendant's conduct is discriminatory with respect to:

- a. ☒ my race
- b. ☒ my color
- c. ☐ my sex
- d. ☐ my religion
- e. ☐ my national origin
- f. ☐ my age

7. I believe that the defendant is still committing these acts against me.

YES ☒ NO ☐

D. CAUSE OF ACTION

1. I allege that the defendant has discriminated against me and that the following facts form the basis for my allegations:

Count 1: Plaintiff was terminated for allegedly possessing alcohol on company premises. (Reason 1 of 3)

Supporting Facts: (Describe exactly what each defendant did or did not do. State the facts clearly in your own words without citing any legal authority. Use additional sheets if necessary.)

The conclusion of the EEOC investigation revealed the defendant admitted to having no proof to bring merit to their allegations of possession of alcohol on premises.

Count 2: Plaintiff was terminated for allegedly smoking on the job. (Reason 2 of 3)

Supporting Facts:

The conclusion of the Employment Security Commission investigation revealed no proof of smoking and the defendant committed perjury when stating they possessed a photo of the plaintiff smoking at a computer desk.

E. INJURY

How have you been injured by the actions of the defendant(s)?

lost of income, can't provide for family, bills becoming behind leading to disconnections, lost thrive (employment) for life

F. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF

Have you filed other lawsuits in state or federal court that deal with the same facts that are involved in this action? YES _____ NO ✓

If your answer is "YES", describe each lawsuit. (If there are more than one lawsuits, describe additional lawsuits on additional separate pages, using the same outline.)

1. Parties to previous lawsuits:

Plaintiff(s): N/A

Defendant(s): _____

2. Name of court and case or docket number: N/A

3. Disposition (for example, was the case dismissed? Was it appealed? Is it still pending?)

N/A

4. Issues raised:

N/A

5. When did you file the lawsuit? N/A (Date: Month/Year)

6. When was it (will it be) decided? N/A

Have you previously sought informal or form relief from the appropriate administrative officials regarding the acts complained of in Part D?

YES ✓ NO _____

If your answer is "YES" briefly describe how relief was sought and the results. If your answer is "NO" explain why administrative relief was not sought.

The Plaintiff timely filed a complaint of discrimination with the EEOC on Feb 21, 2014. Exhausted Administrative relief with notice of rights.

G. REQUEST FOR RELIEF

I believe I am entitled to the following relief:

Compensatory damages emotional distress, back pay punitive damages. The sum being of \$ 50,000 and hand signed letter of recommendation.

JURY TRIAL REQUESTED

YES _____ NO ☒

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty that he/she is the plaintiff in the above action, that he/she has read the above complaint and that the information contained therein is true and correct. 28 U.S.C. §1746; 18 U.S.C. §1621.

Executed at Charlotte, NC on 06/06/14
(Location) (Date)

Shirley A. Jeffers
Signature